**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO: 1:20-CV-1072**

MARTHA HOELZER and all similarly situated individuals, Plaintiff, v. THE BOARD OF GOVERNORS OF THE UNIVERSITY OF NORTH CAROLINA, THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL and RAYMOND FARROW, in his individual and official capacity, BARBARA J. STEPHENSON, in her individual and official capacity, DANIEL LEBOLD, in his individual and official capacity, DAVID ROUTH, in his individual and official capacity, and DEBBIE DIBBERT, in her individual and official capacity, Defendants.	**DECLARATION OF DEREK SCUPIN**

Under 28 U.S.C. § 1746, Derek Scupin, under penalty of perjury, hereby declares and states as follows:

1.   I am over the age of eighteen, of sound mind, and otherwise competent to make this Declaration. The facts set forth in this Declaration are based on my personal knowledge.

1

2. I am a Human Resources Information Management Business Systems Manager at the University of North Carolina at Chapel Hill. I have been in this role for 5 years.

3. I over see a team of analysts that specialize in Human Resources data management and reporting.

4. To determine how many EHRA Non-Faculty exempt State employees held Regular/Non-Temporary Primary jobs classified as either Information Technology professionals or research staff, I wrote a query to search the HR database maintained by UNC Chapel Hill in the regular course of business.

5. This query pulled a list of all EHRA Non-Faculty exempt State employees in Regular/Non-Temporary Primary jobs as of October 31, 2020. In addition, the query determined which of the Regular/Non-Temporary EHRA Non-Faculty jobs were IT positions and which were Research positions.

6. The results of the query revealed that on October 31, 2020, there were 2654 exempt State employees working in primary jobs that were Regular/Non-Temporary EHRA Non-Faculty at UNC Chapel Hill. This number includes 274 IT professionals and 665 research staff.

Exhibit 3

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18th day of May 2022.

Derek Scupin 5/18/2022
DEREK SCUPIN

Exhibit 3